

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

Akilah D. Wallace,)	Case No. 18-24519 GLT
Debtor(s))	Chapter 13
)	Related to Docket No. 73
)	
Ronda J. Winnecour, Chapter 13)	
Trustee,)	Hearing Date and Time:
)	January 12, 2024 at 10:00 A.M.
Movant)	
)	
vs.)	
)	
Akilah D. Wallace,)	
Respondent(s))	

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW, comes the Debtor, Akilah D. Wallace, by and through her attorney Christopher M. Frye, and Steidl and Steinberg, and respectfully represents as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The Trustee filed a Motion to Dismiss on November 21, 2023.
The Debtor remitted a payment of \$2,500.00 on November 22, 2023 and a payment of \$2,500.00 on December 7, 2023 through TFS. The Debtor believes the balance to complete her plan is now \$2,848.00.
5. The Debtor anticipates she will be able to remit the remaining funds by February 2024 when she is to resume her long-term debt payments.

WHEREFORE, the Debtor, Akilah D. Wallace, respectfully requests this
Honorable Court to deny the Trustee's Motion to Dismiss.

Respectfully submitted,

December 11, 2023
DATE

/s/ Christopher M. Frye
Christopher M. Frye, Esquire
Attorney for the Debtor

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